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# TOWN OF JUPITER

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## UTILITIES

PO BOX 8900  
JUPITER FL 33468-8900

August 14, 2002

Matthew Morrison, Director  
Water Supply Department Director  
South Florida Water Management District  
3301 Gun Club Road, B-1 Building  
West Palm Beach, Florida 33406-3089

Re: July 15, 2002 Draft to Loxahatchee River MFL Document

Dear Matt:

We have reviewed the July 15, 2002 Draft to the Loxahatchee River Minimum Flow and Levels (MFL) Document and offer the following comments for your review and action:

1. General: We are supportive of the establishment of the 35 cfs minimum flow to the Northwest Fork of the Loxahatchee as a positive first step in protecting the NW Fork from further impacts due to upstream propagation of saline water.
2. Effects of Consumptive Uses: The document fails to effectively provide evidence of the effects of consumptive uses on the surface and ground water flows to the Loxahatchee Slough and the Northwest Fork of the river. Appendix I to the document has yet to be included which apparently was to serve as supporting documentation. Generally speaking, the conclusions drawn within the text related to the effects of consumptive uses are presently unsubstantiated.
3. Consumptive Use Provisions/MFL: Given the vast financial and technical investment made by Jupiter residents in the use of alternative water supplies in order to protect fresh water flows to the river, strong objection would be offered in response to any action leading to the reduction in existing or proposed consumptive uses within the Town. Regulatory strategies to be adopted by rule, should be crafted to promote the advancement of alternative water supply production, not hamper it. Regulatory strategies such as a prohibition on groundwater drawdowns greater than 0.1 ft beneath the C-18 Canal may

significantly jeopardize the economical feasibility of Jupiter's Alternative Water Supply Program if left to broad interpretation.

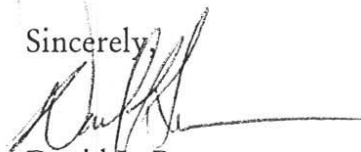
4. Salinity Barrier Feasibility Analysis: We strongly urge the investigation of the feasibility of a structural control to facilitate enhanced restoration of the river's freshwater ecosystem in lieu of wasting fresh water to tide. It is believed that an environmentally sound solution to this option is readily available which would result in far less cost over time plus minimize downstream ecosystem disruption as the southern reaches of the Northwest Fork become less saline.

5. SW Fork MFL: We are greatly disappointed that the District has opted to eliminate the proposed MFL to the SW Fork of the river without properly addressing the need to facilitate the benefits that such a flow would create. It is hoped that the District will come to realize the vast "big picture" environmental benefits of Jupiter's Alternative Water Supply Program and offer support. Failure to secure a cost effective means of RO concentrate disposal will lead to a greater reliance on fresh water supplies which is contrary to our common water management goal.

6. Operational Protocols: The issue of establishing operational protocols for the Northern Palm Beach County Water Supply Projects remains unanswered. Significant concerns exist whether shared adversity is to be the standard of operation in times of drought and whether the SFWMD will be formalizing these arrangements as the operator of the regional system. Without a firm commitment on this matter, it is impossible to judge the appropriateness of any recovery/restoration plan or strategy.

I apologize for the delay of presenting these comments in writing; however, I believe they are reflective of our previous conversations since the publishing of the July 15, 2002 draft document. Should you have any questions, please call.

Sincerely,



David L. Brown  
Director of Utilities

cc: Robert Barolotta, Town Manager  
Jim Anderson, Stemle, Anderson and Associates  
Shannon LaRocque, Assistant Utilities Director  
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